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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

MICHIGAN LICENSED BEVERAGE
ASSOCIATION, a Michigan corporation,

Plaintiff,

v.

AREP, INC. d/b/a ACE BARTENDING
ACADEMY, a Nevada corporation; and
DAVID DOLINSKY, individually

Defendants.

Case No.: 2:20-cv-01664-JAD-VCF

**STIPULATION AND ORDER TO
EXTEND DISCOVERY**

(Second Request)

Plaintiff Michigan Licensed Beverage Association (Plaintiff), and Defendants AREP, Inc., d/b/a Ace Bartending Academy and David Dolinsky (Defendants) (together, the Parties) hereby stipulate to extend all discovery deadlines. The Parties agree to extend these deadlines by 60 days. This Stipulation is the second request to extend deadlines in this case. The Parties previously stipulated to extend the deadline to amend pleadings and add parties only.

In support of this Stipulation, the Parties have conducted the following discovery:

1. DISCOVERY COMPLETED TO DATE:

The Parties have exchanged disclosures, written discovery has been propounded, and the deposition of Defendant David Dolinsky has been taken.

1 **2. DISCOVERY REMAINING TO BE COMPLETED:**

2 The Parties will continue to respond to outstanding written discovery requests, to issue
3 subpoenas to third parties, and to conduct depositions.

4 **3. REASON FOR REQUEST FOR EXTENSION OF DISCOVERY DEADLINES:**

5 Good cause exists to extend discovery deadlines because the Parties have been working
6 towards settlement. The Parties feel that they are close to settling the matter, but still need some
7 time to document and finalize the settlement. The Parties believe they will be able to resolve this
8 matter soon, but would like to extend discovery deadlines by 60 days out of an abundance of
9 caution. This extension is not for purposes of delay.

10 Pursuant to the above, the Parties wish to extend discovery deadlines by 60 days as follows:

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1 **4. PROPOSED SCHEDULE FOR COMPLETING DISCOVERY:**

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Scheduled Event	Current Deadline	Proposed Deadline
Close of Discovery	July 5, 2021	September 7, 2021
Amend Pleadings/Add Parties	May 6, 2021	July 6, 2021
Initial Expert Disclosure Deadline	May 6, 2021	July 6, 2021
Rebuttal Expert Deadline	June 7, 2021	August 9, 2021
Dispositive Motion Deadline	August 4, 2021	October 4, 2021
Pretrial Order	September 3, 2021	November 3, 2021

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If dispositive motions are filed, the deadline
for filing the joint pretrial order will be suspended until 30 days
after decision on the dispositive motions or further court order.

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10 SO STIPULATED on April 30, 2021.

11 DATED April 30, 2021.


DATED April 30, 2021.

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13 /s/ Dan McNutt
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/s/ Ryan Gile
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21 Counsel for Plaintiff

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23 **IT IS SO ORDERED.**

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25 UNITED STATES MAGISTRATE JUDGE

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27 Dated this 30th day of April, 2021.